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MOSER LAW FIRM, P.C.



December 21, 2020

VIA ECF

Hon. Anne Y. Shields, USMJ
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Ruggiero v. County of Suffolk*, 14-cv-07434 (DRH)(AYS)

Dear Judge Shields:

The parties hereby submit the following proposed joint discovery schedule.

1. Initial Disclosures to be served on or before February 15, 2021
2. Interrogatories and First Requests for Production of documents to be served by March 1, 2021
3. Responses to Interrogatories and First Requests for Production of documents to be served by May 3, 2021.
4. Party depositions to be completed by July 1, 2021.
5. Fact discovery to be completed by August 31, 2021.

Respectfully submitted,

/s/ Steven J. Moser
Steven J. Moser